

REC'D
FEDERAL ELECTION COMMISSION
NOV 16 2016

BEFORE THE FEDERAL ELECTION COMMISSION 2016 NOV 16 AM 11:14

In the Matter of)
) MURs 7005 and 7056 CELA
Adam H. Victor; TransGas Development)
Systems, LLC; Gas Alternative Systems,)
Inc.; Project Orange Associates LLC;)
Adam Victor & Son LLC; Adam Victor)
Grantor Trust; Marta Dani (formerly)
Marta Grabowska); Nana Yoshioka;)
Randall Harris; Garry Coulter; Noel)
Daley; Michael C. J. Vanderkemp; Jo-)
Ann Bruggemann; Adam Victor, Jr.;)
Alexia Victor; Alicia Victor; Jo-Ayla)
Victor; Transnational Management)
Systems LLC; Transnational)
Management Systems II, LLC; Herman)
Cain; Friends of Herman Cain and Mark)
J. Block in his official capacity as)
treasurer; Roberto Larrinaga; Pegasus)
Elite Aviation, Inc.; USA Risk)
Intermediaries LLC)

SECOND AMENDED CERTIFICATION

I, Shelley E. Garr, Deputy Secretary of the Federal Election Commission,
do hereby certify that on October 25, 2016, the Commission decided by a vote
of 6-0 to take the following actions in MURs 7005 and 7056:

1. Find reason to believe that Adam H. Victor violated 52 U.S.C. §§ 30116(a) or 30118(a), and 30122 in connection with alleged contributions in the name of another.
2. Find reason to believe that TransGas Development Systems, LLC violated 52 U.S.C. §§ 30116(a) or 30118(a), and 30122 in connection with alleged contributions in the name of another.

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3. Find no reason to believe Adam H. Victor violated 52 U.S.C. §§ 30116(a) or 30118(a) in connection with the leasing of an airplane to Friends of Herman Cain.
 4. Find no reason to believe that Transnational Management Systems II, LLC violated 52 U.S.C. §§ 30116(a) or 30118(a) and close the file as to it.
 5. Find no reason to believe Pegasus Elite Aviation, Inc. violated 52 U.S.C. § 30118(a) and close the file as to it.
 6. Find no reason to believe that Herman Cain or Friends of Herman Cain and Mark J. Block in his official capacity violated 52 U.S.C. §§ 30116(f) or 30118(a) and close the file as to it.
 7. Find no reason to believe that Transnational Management Systems LLC violated the Act and close the file as to them.
 8. Take no action at this time with respect to Adam Victor, Jr., Alexia Victor, Alicia Victor, Jo-Ayla Victor, Jo-Ann Bruggemann, Garry Coulter, Marta Dani (formerly Marta Grabowska), Nana Yoshioka, Randall Harris, TransGas Energy Systems LLC, Gas Alternative Systems, Inc., Project Orange Associates LLC, Adam Victor & Son LLC, Adam Victor Grantor Trust, USA Risk Intermediaries LCC, Noel Daley, Michael C. J. Vanderkemp, and Roberto Larranga with respect to the alleged contributions in the name of another.
 9. Approve the Factual and Legal Analyses as recommended in the First General Counsel's Report dated October 5, 2016 for Transnational Management Services LLC, Herman Cain, Friends of Herman Cain and Mark J. Block in his official capacity as treasurer, and Pegasus Elite Aviation, Inc.; and as recommended in the First General Counsel's Report dated October 5, 2016 for Adam H. Victor, ~~TransGas Development Systems LLC, and Transnational~~ Management Services II, LLC subject to the edits last circulated by Commissioner Ravel's Office on October 24, 2016 at 4:02 p.m.

10. Authorize the use of compulsory process, as necessary.

11. Approve the appropriate letters.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub
voted affirmatively for the decision.

Attest:

November 16, 2016
Date

Shelley E. Gair
Shelley E. Gair
Deputy Secretary of the Commission